

EXHIBIT A

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ANDROS MARITIME COMPANY LIMITED,

Petitioner,

-against-

INTERNATIONAL OIL OVERSEAS, INC.,
a/k/a IOOI, a/k/a INTERNATIONAL OIL
OVERSEAS INCORPORATION,
MARINA WORLD SHIPPING CORP.,
GRESHAM WORLD SHIPPING CORP.,
TARAZONA SHIPPING CO., S.A., QUOIN
ISLAND MARINE WL, BAKRI TRADING
COMPANY INC., SCHIFF HOLDING CO.
S.A., and TRANS MEDITERRANEAN
SHIPPING INC.,

Respondents.

ECF CASE

11 Civ. 1657 (WHP)

**DECLARATION OF
STAVROS SEVASTOPOULOS**

I, STAVROS SEVASTOPOULOS, hereby declare and state pursuant to 28 U.S.C. §1746 as follows:

1. I am Managing Director of Anthemis Marine Claims Consultancy Ltd. ("Anthemis") of Athens, Greece. I submit this Declaration in opposition to the motion of respondents to vacate the default judgment entered against them.
2. This Declaration is based upon my personal knowledge in my capacity as Managing Director of Anthemis and based upon the business records maintained by Anthemis. I read and understand the English language.
3. In October 2010, Anthemis was retained by Polembros Shipping Limited ("PSL") to seek recovery on several claims against INTERNATIONAL OIL OVERSEAS INC. ("IOOI") in connection with the charters of vessels under the management of PSL. One of the claims for which we sought recovery was the arbitral award issued against IOOI regarding the M/T GOOD

HOPE charter. The total amount of these claims exceeded US\$333,000.

4. Between October 2010 and October 2011, I had regular and frequent communications with representatives of IOOI regarding the claims for which we sought recovery on behalf of PSL. My communications were by telephone and e-mail. The general contact details for IOOI are:

Telephone 00966 265 24298 // 00966 265 16905 (reception)

Telefax 00966 265 12908

E-mail (general) iooemail@emailsrv.com

Business address Al Bakri Building
Al-Andalus Street
Jeddah 21424
Saudi Arabia

5. In my communications with IOOI, I spoke over the telephone or exchanged e-mails with one of the following three representatives:

Mr. Abdul Rahim Cherattil (Claims Manager) (telephone extension 231)
Office e-mail: acherattil@emailsrv.com
Personal e-mail: rahimck@gmail.com
Mobile no.: 00966 540 427631

Mr. Sheharyar (Chartering Department Broker) (telephone extension 223)
Office e-mail: sbacker@emailsrv.com

Capt. F. Siddiqui (Director) (telephone extension 315)
Office e-mail: fsiddiqui@emailsrv.com


6. On each occasion when I called IOOI, I used the foregoing telephone numbers. The country code for Saudi Arabia is 966 (the prefix 00 is for international access from Greece) and the city code for Jeddah is 2.

7. My most recent communications with IOOI was in early October 2011 by telephone and e-mail with Mr. Cherattil at the foregoing contact details. Copies of my

September and October 2011 correspondence with IOOI are attached.

I declare and state under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on this 29th day of November, 2011, at Athens, Greece.



Stavros Sevastopoulos

CERTIFICATE OF SERVICE

Michael A. Namikas, an attorney duly admitted to practice before this Honorable Court, affirms on this 2nd day of December 2011, that he served true copies of the foregoing, via electronic mail, to:

Freehill, Hogan & Mahar, LLP
80 Pine Street
New York, New York 10005

Attn: Michael E. Unger, Esq.
unger@freehill.com

A handwritten signature in black ink, appearing to read 'M. Namikas', written over a horizontal line.

Michael A. Namikas

Print copy for :Baxivanos John.

Message: 2414660

From: Anthemis Marine Claims Consultancy Ltd. <anthemismarine@ontelecoms.gr>

Subject: Attn: Y. Kassimis

Date: Thu, 06 Oct 2011 12:43:41 (UTC +03:00)

Attachments:

To: "polembros@polembros.gr" <polembros@otenet.gr>

Our ref: ss/looi/09

RE: OUTSTANDING CLAIMS WITH POLEMBROS SHIPPING LTD.

Please view below email exchange following our repeated daily telephone calls this week with Mr. Cheratill.

We shall continue to press IOOI for some sort of positive response.

Yours faithfully

Anthemis Marine Claims Consultancy Ltd.
102-106 Vas. Pavlou
Voula Centre
166 73 Voula
Athens

tel: 0030 210 8993505-6
fax:0030 210 8993507
e-mail: anthemismarine@on.gr

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----- Original Message -----

From: Anthemis Marine Claims Consultancy Ltd.

To: AbdulRahim Cherattil

Sent: Thursday, October 06, 2011 12:27 PM

Subject: Re: your claims

Dear Abdul Rahim,

Thank you for your update although it contains no concrete news.

As repeatedly discussed during our telephone conversations over the past year, it is very important that all claims are concluded amicably and although you have expressed your top management's willingness to revert with a proposal for settlement or to arrange a meeting where we can discuss further the conclusion of these claims, nothing has evolved so far despite our continuous reminders.

We very much hope IOOI is not avoiding these claims,as this will only result in additional arbitration proceedings upon each time bar of each claim,as previously pointed to you.

Kindly revert the soonest with an favourable update from your senior managment so that we can convey same to our clients.

Best regards

Stavros Sevastopoulos.
Anthemis Marine Claims Consultancy Ltd.
102-106 Vas. Pavlou
Voula Centre

166 73 Voula
Athens

tel: 0030 210 8993505-6
fax:0030 210 8993507
e-mail: anthemismarine@on.gr

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----- Original Message -----

From: [AbdulRahim Cherattil](#)
To: 'Anthemis Marine Claims Consultancy Ltd.'
Sent: Thursday, October 06, 2011 12:12 PM
Subject: your claims

Dear Mr. Stavros

My colleague has informed me that you have tried to phone me.
I am very sorry I have not been able to meet the executives of our top mgmt owing to their busy schedule.

Kind regards

Abdul Rahim

Print copy for :Baxivanos John.

Message: 2398439

From: Anthemis Marine Claims Consultancy Ltd. <anthemismarine@ontelecoms.gr>
Subject: Attn: Y. Kassimis
Date: Wed, 14 Sep 2011 17:33:11 (UTC +03:00)
Attachments:
To: "polembros@polembros.gr" <polembros@otenet.gr>

Our ref: ss/iooi/09

RE: OUTSTANDING CLAIMS WITH POLEMBROS SHIPPING LTD.

Please view below email exchanges following our daily telephone conversations with Mr. Cherattil since this Monday uptill today.

Let us hope he actually reverts with some kind of concrete news.

Eitherway we shall continue to pressure him for some kind of response.

Best regards

Stavros Sevastopoulos.
Anthemis Marine Claims Consultancy Ltd.
102-106 Vas. Pavlou
Voula Centre
166 73 Voula
Athens

tel: 0030 210 8993505-6
fax:0030 210 8993507
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----- Original Message -----

From: Anthemis Marine Claims Consultancy Ltd.
To: AbdulRahim Cherattil
Sent: Wednesday, September 14, 2011 5:28 PM
Subject: Re: OUTSTANDING CLAIMS

Our ref: ss/iooi/09

Dear Mr. Cherattil,

RE: OUTSTANDING CLAIMS WITH POLEMBROS SHIPPING LTD.

Thank you for your email and look forward to hearing from you and the senior management favourably so that this reference can be finally concluded amicably.

Best regards

Stavros Sevastopoulos.
Anthemis Marine Claims Consultancy Ltd.
102-106 Vas. Pavlou
Voula Centre
166 73 Voula
Athens

tel: 0030 210 8993505-6
fax:0030 210 8993507
e-mail: anthemismarine@on.gr

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----- Original Message -----

From: AbdulRahim Cherattil
To: 'Anthemis Marine Claims Consultancy Ltd.'
Sent: Wednesday, September 14, 2011 1:10 PM
Subject: RE: OUTSTANDING CLAIMS

Dear Mr.Stavros

I refer to your below email and will revert to you in a few days.

Kind regards

Abdul Rahim
IOOI

From: Anthemis Marine Claims Consultancy Ltd. [<mailto:anthemismarine@ontelecoms.gr>]
Sent: Monday, September 12, 2011 1:09 PM
To: AbdulRahim Cherattil; rahimck@gmail.com
Cc: fsiddiqui@emailsrcv.com; iooemail@emailsrcv.com; sbacker@emailsrcv.com; polembros@otenet.gr
Subject: OUTSTANDING CLAIMS
Importance: High

without prejudice

Our ref: ss/iooi/09

To: International Oil Overseas Inc.
Attn: Mr. Abdul Rahim Cherattil

CC: Mr. Sheharyar // Capt. Siddiqui

CC:: Polembros Shipping Ltd.
Attn: Y. Kassimis

Dear Mr. Cherattil,

RE: OUTSTANDING CLAIMS WITH POLEMBROS SHIPPING LTD.

We refer to our telephone conversation moments ago regarding the above ongoing reference.

We understand now, as discussed today, that the principals of senior management have returned to the office and are in position to update us on their decision regarding:

- a) Either our proposal for a meeting between their representative and Mr. Kassimis (ric) for negotiating an amicable settlement on the total amounts due to Polembros in excess of USD 333,000
- b) OR at least immediate payment of the outstandings legally due under the reference MT GOOD HOPE (CP 07/06/03 & 06/08/03) which are now in excess of USD 135,000.

Kindly revert with favourable news without any further delay from your principals on the above points so this matter can be finally concluded amicably.

Thanking you
Best regards

Stavros Sevastopoulos.
Anthemis Marine Claims Consultancy Ltd.
102-106 Vas. Pavlou
Voula Centre
166,73 Voula
Athens

tel: 0030 210 8993505-6
fax:0030 210 8993507
e-mail: anthemismarine@on.gr

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